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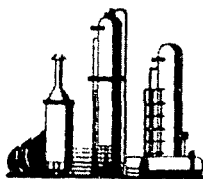
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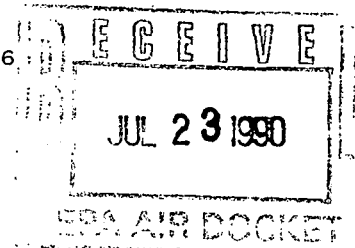


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Environmental Protection Agency
Air Docket (LE-131)
401 M Street, S.W.
Washington, D.C. 20460

Gentlemen:

The National Petroleum Refiners Association (NPRA) hereby submits its comments on the application submitted by Ethyl Corporation pursuant to Section 211(f) of the Clean Air Act for a waiver for the manganese-based gasoline additive, MMT. NPRA is a national trade association whose members include virtually every refiner and petrochemical manufacturer in the United States.

Refiners today are facing increasing costs as they seek to comply with a growing body of environmental regulations. The MMT octane enhancer would lower the cost of producing gasoline while at the same time raising octane levels. Use of the additive will enable refiners to obtain greater volumes of motor gasoline from a barrel of crude oil. It will also save energy required for high severity processing that would otherwise be required to achieve higher octane levels, at the same time reducing the quantity of less desirable by-products.

In coming months, it is anticipated new Clean Air legislation will be enacted that imposes further requirements on refiners to produce federally-mandated reformulated gasoline. NPRA recently surveyed its members on the MMT waiver petition. A preponderance of NPRA's refining members who responded to the survey, particularly small and independent refiners, support granting the waiver request.

Use of MMT is expected to result in lower overall emissions, and therefore cleaner air, as well as enable the U.S. refining industry to produce gasoline at higher yields and with greater efficiency. We support approval of the Ethyl waiver submission.

Very truly yours,